



May 27, 2020

**VIA ECF**

Hon. Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Courtroom 21A  
New York, NY 10007-1312

**Re:   Stewart v. Stewart**  
**Case No. 19-cv-05960**

Dear Judge Buchwald:

This letter responds to Ms. Kaufman's May 13<sup>th</sup> e-mail requesting a proposed revised scheduling order. In light of the continued restrictions due to the Covid-19 pandemic, we do not believe we can yet conduct depositions or safely travel, which obviously inhibits our ability to proceed with essential discovery at this time. We thereby request that submission of proposed revised orders be delayed until restrictions are lifted and there is a clear direction as to how in-person discovery can be handled.

Plaintiff further wishes to report that the parties have taken seriously the Court's suggestion to make efforts to resolve the case through settlement. We have requested cooperation from defense counsel in identifying property that has been offered by defendant, but that request has apparently derailed discussions. As such, we believe it would be helpful if the Court would schedule a conference to assist the parties in moving forward with these discussions, and accordingly make that request.

Thank you for your attention to this matter.

Very truly yours,

David P. Marcus

DPM:cac

cc: Edward P. Yankelunas, Esq. (*via ECF*)  
Catherine Pastrikos Kelly, Esq. (*via ECF*)  
David B. Grantz, Esq. (*via ECF*)  
Javier M. Lopez, Esq. (*via ECF*)